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Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: Redistribution of Spectrum to the 2 GHz Mobile Satellite
Service Providers; IB Docket Nos. 05-220 and 05-221

Dear Ms. Dortch:

In recognition of the importance of a competitive mobile satellite service ("MSS") industry to the public interest, Loral Space and Communications ("Loral") applauds the Commission for redistributing spectrum to the remaining licensees in the 2 GHz MSS band.¹ The resulting 2 x 6.67 MHz assignment provided to each licensee falls short, however, of the baseline 2 x 10 MHz necessary to deliver the full benefits of an MSS, including those with ancillary terrestrial component ("ATC") to the public. Accordingly, Loral urges the Commission to promptly redistribute the 2 x 6.67 MHz of unassigned 2 GHz MSS spectrum² on a *pro rata* basis to TMI Communications and Company Limited Partnership, which is affiliated with TerreStar Networks Inc., and ICO Global Communications (Holdings) Limited (collectively, "the 2 GHz providers").

¹ See *Commission Invites Comments Concerning Use of Portions of Returned 2 GHz Mobile Satellite Service Frequencies*, Public Notice, FCC 05-133, IB Docket No. 05-220 (rel. June 29, 2005).

² As the Commission's Public Notice notes, this "unassigned" spectrum represents the MSS spectrum recently surrendered by Celsat Inc. See *Commission Invites Comments Concerning Use of Portions of Returned 2 GHz Mobile Satellite Service Frequencies*, Public Notice, FCC 05-134, IB Docket No. 05-221 (rel. June 29, 2005).

Loral is a world-class leader in the design and manufacture of satellites and satellite systems for commercial and government applications including direct-to-home television, broadband communications, wireless telephony, weather monitoring and air traffic management. Loral also is a satellite communications company. It owns and operates a fleet of telecommunications satellites used to broadcast video entertainment programming, distribute broadband data, and provide access to Internet services and other value-added communications services.

By allowing the 2 GHz providers to offer affordable service to millions of users across the country – including those in the public safety community – the requested spectrum redistribution would serve pressing homeland security needs. First, unlike terrestrial networks, an MSS/ATC network is truly ubiquitous. First responders with MSS/ATC-equipped handsets could communicate to and from virtually *any* location in the continental United States, including the most rural areas as well as densely-populated “urban canyons.” Second, because MSS/ATC networks are redundant, communicating with satellites thousands of miles in the sky as well as terrestrial base stations, they are considerably less vulnerable to attack than terrestrial-only wireless services and the wireline telephone network.³ If MSS/ATC technology becomes widespread, it would clearly be an invaluable tool during times of emergency. Generating the capacity and related economies of scale to widely deploy MSS/ATC-enabled handsets, however, requires access to sufficient spectrum.

Also owing to the ubiquitous nature of satellite technology, with sufficient spectrum, the 2 GHz providers could provide affordable but sophisticated mobile voice and data services to consumers in traditionally underserved areas. Congress and the Commission have appropriately focused on the need for bringing the next generation of mobile communications technology to *all* Americans. Providing the 2 GHz providers with the baseline 2 x 10 MHz assignment necessary to deploy a robust MSS/ATC service will honor that commitment.

To ensure that the unique public interest benefits of MSS/ATC technology can reach as many consumers as possible, the Commission should not allow uncertainty as to the spectrum assignment for the 2 GHz providers to persist. Further delay would be especially detrimental to first responders, homeland security agencies, and rural consumers. Accordingly, Loral urges the Commission

³ *See, e.g.*, Comments of TerreStar Networks Inc., WT Docket 05-157, at 1 (filed April 28, 2005), *citing* 19 FCC Rcd. 16830, 16836 (2004) (discussing the immediate aftermath of the terrorist attacks of Sept. 11, 2001, and noting that “satellite communications ... were used to initiate the movement of equipment and personnel into the affected areas for restoration purposes and to coordinate their work.”).

to promptly make a *pro rata* redistribution of the unassigned 2 GHz MSS spectrum to TMI/TerreStar and ICO.

Respectfully submitted,

Laurence D. Atlas